Neurology

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April 19, 2016

Ms. Megan Basham Davis Megan.davis@nelsonmullins.com

Re: William Talbott

Dear Ms. Davis:

I am writing to describe a comprehensive neurological examination such as I propose to perform upon Mr. Talbott. The procedure involves taking a detailed history and conducting pertinent physical examination. I anticipate that the entire process will take up to three hours.

The history begins with basic information including age and handedness, along with educational and vocational background; any history of military service; marital status; ages of any children; and current living situation.

The information obtained further includes a complete review of previous health history (aside from colds or flu). Specific topics among past medical history are any prior injuries leading to medical attention; previous hospitalizations and emergency department visits; surgeries; chronic medical conditions; emotional or mental health problems (and any related treatment) in the past; history of drug or alcohol abuse; medication allergies; and family medical history.

The history then focuses on the details of the alleged injury underlying the current claim, and any subsequent problem(s) said to be related to it. Each such complaint, and any treatment for it, is explored, along with any consequent impact upon vocational, functional and emotional status. The history also includes any reinjury or new-onset health problem since the alleged injury, but unrelated to it.

EXHIBIT

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Finally, a standard neurological examination (the type of physical examination routinely conducted by a neurologist) will be performed, consisting of assessment of mental status, cranial nerve functions, motor and sensory functions, reflexes, coordination and gait. Depending on Talbott's history, a Mini-Mental State Examination may be administered, as well as musculoskeletal examination directed at any specific such complaints.

This process of thorough, direct, in-person evaluation would be supplemented by review of all relevant records, but records alone cannot adequately substitute for a comprehensive examination as detailed above. Records often contain not only conflicting but also substantially limited information, the latter issue being especially pertinent with regard to aspects of Mr. Talbott's history and neurological findings which I may consider of importance but which may have been relatively neglected by others who have met with him, including both treating healthcare providers and plaintiff's experts.

Yours sincerely,

David Buchholz, M.D.